

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

In re:

TRIBUNE COMPANY, *et al.*,  
Reorganized Debtors.

WILMINGTON TRUST COMPANY, *et al.*,  
Appellants,

v.

TRIBUNE COMPANY, *et al.*,  
Appellees.

Chapter 11  
Bankruptcy Case No. 08-13141 (KJC)  
Jointly Administered

Case No. 12-cv-128 GMS  
Case No. 12-mc-108 GMS  
Case No. 12-cv-1072 GMS  
Case No. 12-cv-1073 GMS  
Case No. 12-cv-1100 GMS  
Case No. 12-cv-1106 GMS  
CONSOLIDATED APPEALS

**STIPULATION AND JOINT PROPOSED BRIEFING SCHEDULE  
BETWEEN REORGANIZED DEBTORS, AURELIUS CAPITAL  
MANAGEMENT, LP, LAW DEBENTURE TRUST COMPANY OF NEW  
YORK, DEUTSCHE BANK TRUST COMPANY AMERICAS, WILMINGTON  
TRUST COMPANY, AND EGI-TRB, LLC, FOR REORGANIZED DEBTORS'  
MOTION TO DISMISS APPEALS AS EQUITABLY MOOT**

WHEREAS, on January 18, 2013, the Reorganized Debtors filed a motion, with a supporting memorandum and the declarations of two witnesses, to dismiss the above-captioned, consolidated appeals (the "Motion to Dismiss") (Docket Nos. 58-62);

WHEREAS, under the Federal Rules of Civil Procedure and the Local Rules of Civil Practice and Procedure of the United States District Court for the District of Delaware, responses to the Motion to Dismiss are due on February 4, 2013, and replies thereto are due on February 14, 2013;

WHEREAS, on January 23, 2013, and January 25, 2013, respectively, Aurelius Capital Management, LP ("Aurelius"), and Law Debenture Trust Company of New York ("Law Debenture") served discovery requests on the Reorganized Debtors relating to the Motion to Dismiss;

WHEREAS, the parties are working to resolve their differences with respect to these discovery requests without Court intervention;

WHEREAS, the parties respectfully submit that additional time is required for the remaining briefing on the Motion to Dismiss; and

WHEREAS, the Reorganized Debtors respectfully submit that allowing the filing of a consolidated reply best serves the interests of judicial economy;

**IT IS HEREBY STIPULATED AND PROPOSED**, by and between the Reorganized Debtors, Aurelius, Law Debenture, Deutsche Bank Trust Company Americas, Wilmington Trust Company, and EGI-TRB, LLC, and subject to the Court's approval, as follows:

- A. Responses, if any, to the Motion to Dismiss shall be filed no later than February 12, 2013.
- B. The Reorganized Debtors' reply shall be filed no later than February 26, 2013.
- C. The Reorganized Debtors shall file a consolidated reply brief to all responses that shall not exceed one half (1/2) of the combined pages of the responses.

Dated: Wilmington, DE  
January 31, 2013

COLE, SCHOTZ, MEISEL,  
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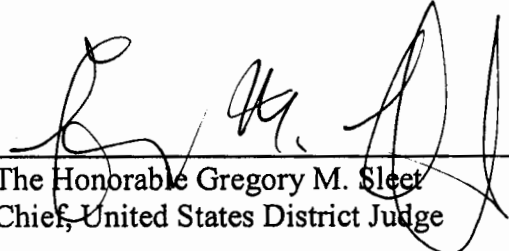
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*Counsel for EGI-TRB, LLC*

**IT IS SO ORDERED.**

DATED: Feb 4, 2013  
Wilmington, Delaware

  
The Honorable Gregory M. Sleet  
Chief, United States District Judge